

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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In the Matter of)
)
The Development of Operational)
Technical and Spectrum Requirements)
For Meeting Federal State and Local)
Public Safety Agency Communication)
Requirements Through the Year 2010)
)
Establishment of Rules and Requirements)
For Priority Access Service)

WT Docket No. 96-86

COMMENTS
of the
NPSPAC REGIONAL REVIEW COMMITTEE, REGION 49

I. INTRODUCTION

The NPSPAC Regional Review Committee, Region 49, hereby submits the following comments filed in response to the Commission's Second Notice of Proposed Rule Making in the above-captioned proceeding.

NPSPAC Region 49 is the 30 county central Texas area with Austin, the state capital, as its major city. The Committee's members include representatives from statewide, county, and local agencies. Almost half of the current committee members have been members of the Regional Planning and Review Committees since the initial Region 49 meeting was convened in 1989.

II. INTEROPERABILITY

We agree with the Commission's proposal to dedicate clear spectrum for interoperability in the 746-806 MHz band. Existing interoperability channels in other frequency bands should be maintained, but limited to local use within the structure of a national interoperability plan, so that the interoperability efforts made to date are not wasted.

We agree with the PSWAC ISC recommendation that analog modulation for voice interoperability should be the minimum common mode adopted immediately. In our experience, the simplest forms of communication remain the most reliable under adverse conditions.

In anticipation of the inevitable migration to digital technology, however, we believe that a single digital standard for interoperability needs to be established as quickly as possible to make seamless nationwide interoperability possible. We sadly note that the cellular industry's success in providing near-nationwide service with the AMPS standard is now being ignored with the implementation of multiple digital technologies (TDMA, CDMA, GSM, etc.) in cellular and PCS. We must avoid repeating this scenario with public safety interoperability.

We believe it will be necessary for the Commission to mandate the inclusion of the interoperability channels in all new public safety radios to achieve seamless nationwide interoperability. Interoperability capacity must be instantly available in all radios at an incident because the first need for assistance develops as soon as initial emergency responders become overwhelmed. We suggest that the Commission also urge the manufacture of "interoperability only" radios to enable interoperability participation by those entities not changing their present radio systems.

Although most public safety agencies are adept at envisioning emergencies beyond their own response capabilities, the myriad levels of political and financial managers controlling their budgets frequently are not. All too often, only immediate needs and mandates get funded. We can only note how ironic it is that an entity opposing mandatory mutual aid capability during the 1987 NPSPAC proceeding subsequently experienced a tragic fire in which the lack of interoperability was a significant factor.

We believe that a national planning process should develop specific guidelines for mutual aid interoperability within which regional plans can be made. These guidelines would outline a structure for planned communications escalation, perhaps similar in form to the ICS management model, that would be imposed at all levels. The guidelines would also include minimal allocations for each type of communication, with preassignments for each ICS function (command, operations, logistics, etc.) and a pool of channels for physically sectorized operations (i.e., north side of fire, east side of fire, etc.).

We believe that day-to-day and task force interoperability should be planned and administered at the Regional level to allow flexibility for local needs. We also note that the occurrence of a mutual aid incident may not always reduce the need for continuing day-to-day and task force interoperability. We discourage a blanket change of all interoperability channels to exclusive mutual aid use during emergencies.

We have learned in our own Region that infrastructure-dependent communications systems are at risk for failure, no matter how well designed and backed

up. We also note that some of the highly-touted features of trunking, such as regrouping and visitor unit identification, have rarely been used during actual emergencies due to time and logistical constraints. Therefore we cannot support the exclusive use of trunking for interoperability.

However, we believe that trunking should be encouraged as an additional option, particularly in those areas where the population density makes it likely that maximum spectrum efficiency will be needed in almost any emergency situation.

Also, like a single digital interoperability standard, we believe that a single trunking standard must also be adopted to ensure uniform interoperability.

III. GENERAL SERVICE

We agree with the Commission that the regional planning approach has worked well for the NPSPAC 821 MHz band, and that the interest and necessary expertise for 746-806 MHz planning exists in the regional committees. However, the existence of six separate Regions within Texas has caused considerable work for some individuals with statewide responsibilities. We would prefer that planning for the 746-806 MHz spectrum be done as a single Region.

We request that the Commission better define the authority of the regional planning committees and regional review committees, and that this authority include the power to review licensee compliance with the Regional Plans and refer noncompliance to the Commission for enforcement. We also request that the Commission establish a funding mechanism to support the work of the regional committees.

We believe that the suggestion to require express concurrence for changes in a Regional Plan from all adjoining regions grants an unwarranted *de facto* veto power. While concurrence is certainly desirable, differences will occur, and the current public notice/comment/order process works.

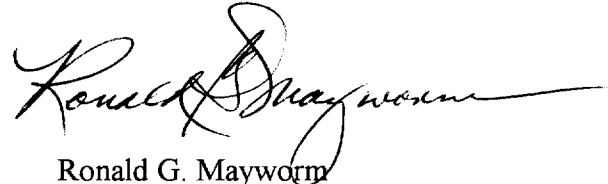
We favor the adoption of a Commission-designed band plan, with regions having the flexibility to “aggregate” and “disaggregate” general service channels (Approach 3, para. 147 of the Second Notice). This allows for reasonable equipment standardization, while enabling technical progress, and allowing local flexibility.

Similarly, we believe that regions should also have the ability to determine minimum co-channel spacing between base stations. The extreme variations of terrain in this country, its real-world effects on radio wave propagation, and opportunities to realize unique spectrum efficiencies are best recognized locally.

Although 24 MHz of new spectrum is a windfall for public safety, the demand will, at some time (perhaps immediately, in some areas), exceed the supply. It would be foolish not to use proven, spectrally-efficient, and currently available technology to maximize this

resource. Therefore, we recommend that the Commission continue, as with the 821 MHz NPSPAC band, to require trunking on general service large systems, and to promote and encourage consolidation and formation of multi-jurisdictional trunked systems.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ronald G. Mayworm", with a long, sweeping horizontal line extending to the right.

Ronald G. Mayworm
Chairman

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